

Exhibit 4

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF OKLAHOMA

BLACK EMERGENCY RESPONSE TEAM,
et al.,

Plaintiffs,

v.

JOHN M. O'CONNOR, *et al.*

Defendants.

No. 21-cv-1022-G

AFFIDAVIT OF JANET C. BARRESI

I, Janet C. Barresi, declare the following:

1. I served as Oklahoma State Superintendent of Public Instruction from January 2011 to January 2015. In this capacity, I oversaw all aspects of Oklahoma's public education system, including serving as Chair of the Oklahoma State Board of Education and Chair of the Oklahoma State Board of Career and Technology. I also served as a member of the Regional Universities System of Oklahoma (RUSO), a division of the Oklahoma State Regents for Higher Education.
2. I received my education from the University of Oklahoma, obtaining a Bachelor's Degree and Master's Degree in Speech and Language Disorders, and a Doctor of Dental Surgery (DDS). Prior to serving as State Superintendent, and before my lengthy dentistry career, I worked in several different positions related to education in Oklahoma, including as a Speech & Language Pathologist in Norman Public Schools and Harrah Public Schools and as an Adjunct/Special Faculty at the University of Oklahoma College of Medicine. I was also a certified teacher from 1975 to 1980, and I have been involved for years in advocating for education choice initiatives, such as charter schools.

3. I currently serve as the State Coordinator for the STOP Critical Race Theory (CRT) Coalition, which is a program operated by the Oklahoma Council of Public Affairs (OCPA). I have volunteered in this role since around the time when House Bill 1775 was enacted into law in May 2021. I got involved after I read H.B. 1775 and began researching some of the disturbing things that are increasingly being taught in public schools relating to race, sex, and other controversial issues.
4. In my role as State Coordinator, I educate and engage one-on-one with parents and other concerned citizens across the state of Oklahoma about critical race theory and related topics, as well as the requirements of H.B. 1775 and OAC 210:10-1-23. In addition, I attend meetings to present information to parents and other concerned citizens (such as grandparents) to discuss the requirements of H.B. 1775 and OAC 210:10-1-23. Thus far, I have attended and provided technical assistance to Oklahomans at twelve different public meetings across Oklahoma. Over 750 Oklahomans attended these meetings.
5. Race-based principles commonly associated with critical race theory, such as anti-racism, equity, and the like, are being taught in Oklahoma public schools. What I have discovered is that from the earliest of grades, children are being oriented toward evaluating their environment based on skin color, and this increases through successive grades. In an average week, I hear from a minimum of three individual parents or citizens who have concerns about programs and activities in their child's or grandchild's school district that, in some way, implicate these theories. Their children or other parents are telling them that the children are being subject to race-based activities, or that their teachers are promoting specific and controversial viewpoints on race, sex, gender, or sexual

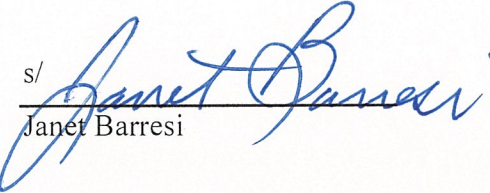
orientation, and denigrating viewpoints such as colorblindness.

6. In some of these cases, parents have documentation of learning activities, reading materials, or other classroom or homework assignments that include, for example, race or sex-based classifications. To be clear, not all of these are arguable violations of H.B. 1775, which is narrowly constructed, but they are often disturbing, and at times deeply so. In one particularly troubling instance, a young white student was segregated from his classmates and told he was an oppressor because of his skin color. And no school district is immune. I have received reports from all over the State.
7. Many parents are deeply concerned about speaking out about this, in public or to their school's administration. They feel inhibited because of the possibility of retribution to themselves or their children. People are scared of being called a racist. And the parents who do speak out often feel frustrated or stonewalled in their attempts to access information by school districts. Others become frustrated by a lack of access to their school board members.
8. I have also spoken with teachers who are concerned about these developments. Several Oklahoma teachers I've talked to have expressed concern about Diversity Equity and Inclusion (DEI) programs and Social and Emotional Learning (SEL) training that require them to incorporate racial classifications and treat students differently based on race. Educators have likewise experienced retaliation for refusing to utilize educational materials that require them to accept racially divisive principles and incorporate those principles into their classroom environment and culture. Like parents, and perhaps more so, many of these teachers are hesitant to come forward or speak out about this for fear

of retaliation.

I state under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed this 16th day of December, 2021, in Oklahoma City, Oklahoma.

s/ 
Janet Barresi